

TEST TITLE:MAIN.NET PLC.INC  
DATA FILE :332\_N.D30  
Amplitude Units : dBuV

Threshold -20 dB

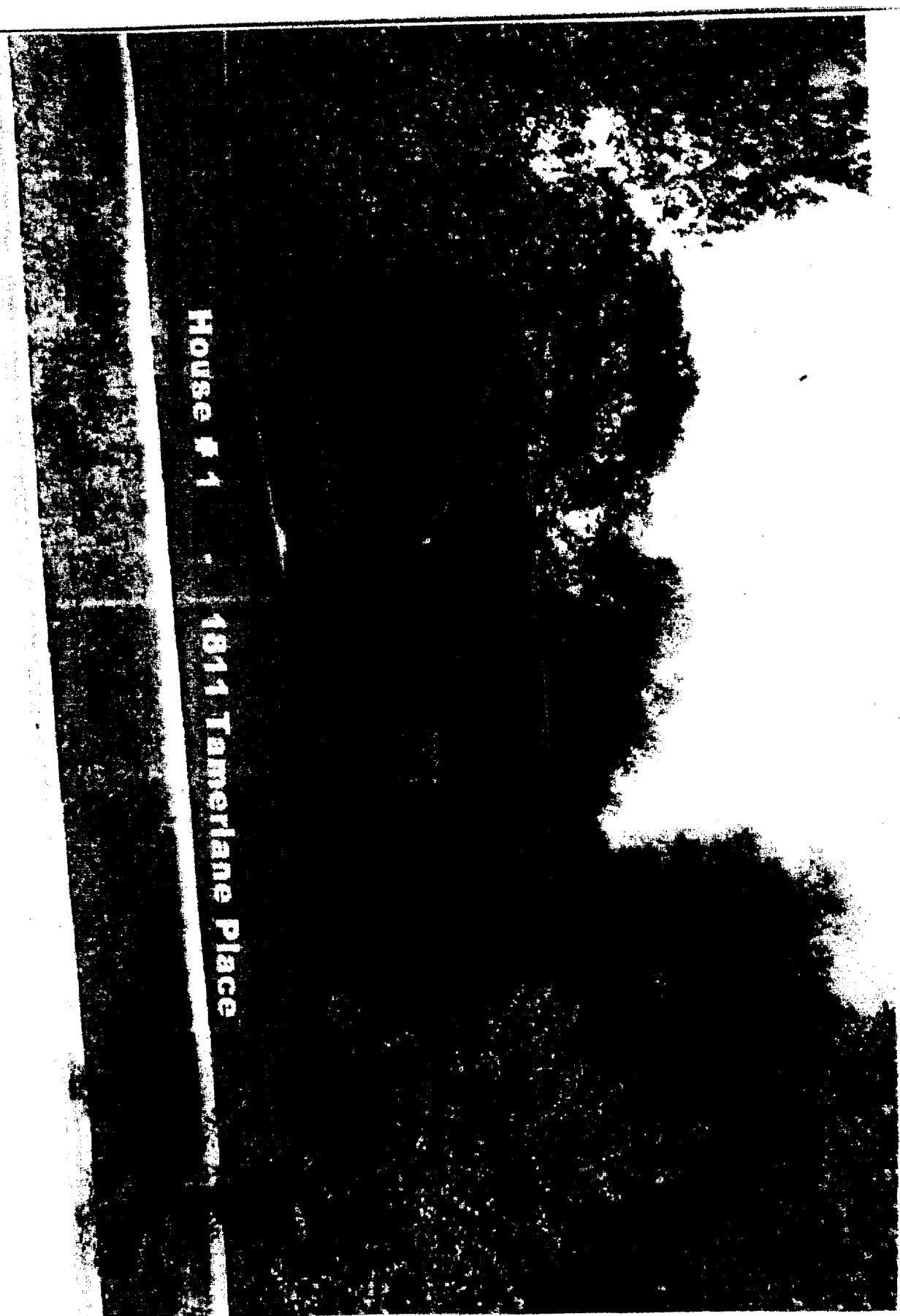
PAGE 1  
Freq.(MHz)  
0.5350

| Freq(MHz) | Amp  | CARRIER.S30<br>vs Spec(dB) |
|-----------|------|----------------------------|
| 1.6642    | 42.0 | -18.000 *                  |
| 1.6675    | 45.0 | -15.000 *                  |
| 1.6709    | 43.0 | -17.000 *                  |
| 1.6743    | 43.0 | -17.000 *                  |
| 1.6776    | 41.0 | -19.000 *                  |
| 1.6844    | 42.0 | -18.000 *                  |
| 1.6877    | 43.0 | -17.000 *                  |
| 1.6911    | 45.0 | -15.000 *                  |
| 1.6945    | 45.0 | -15.000 *                  |
| 1.6979    | 44.0 | -16.000 *                  |
| 1.7012    | 42.0 | -18.000 *                  |
| 1.7046    | 40.0 | -20.000 *                  |
| 1.7050    | 41.0 | -19.000 *                  |

A10

## Home Photos & Layouts

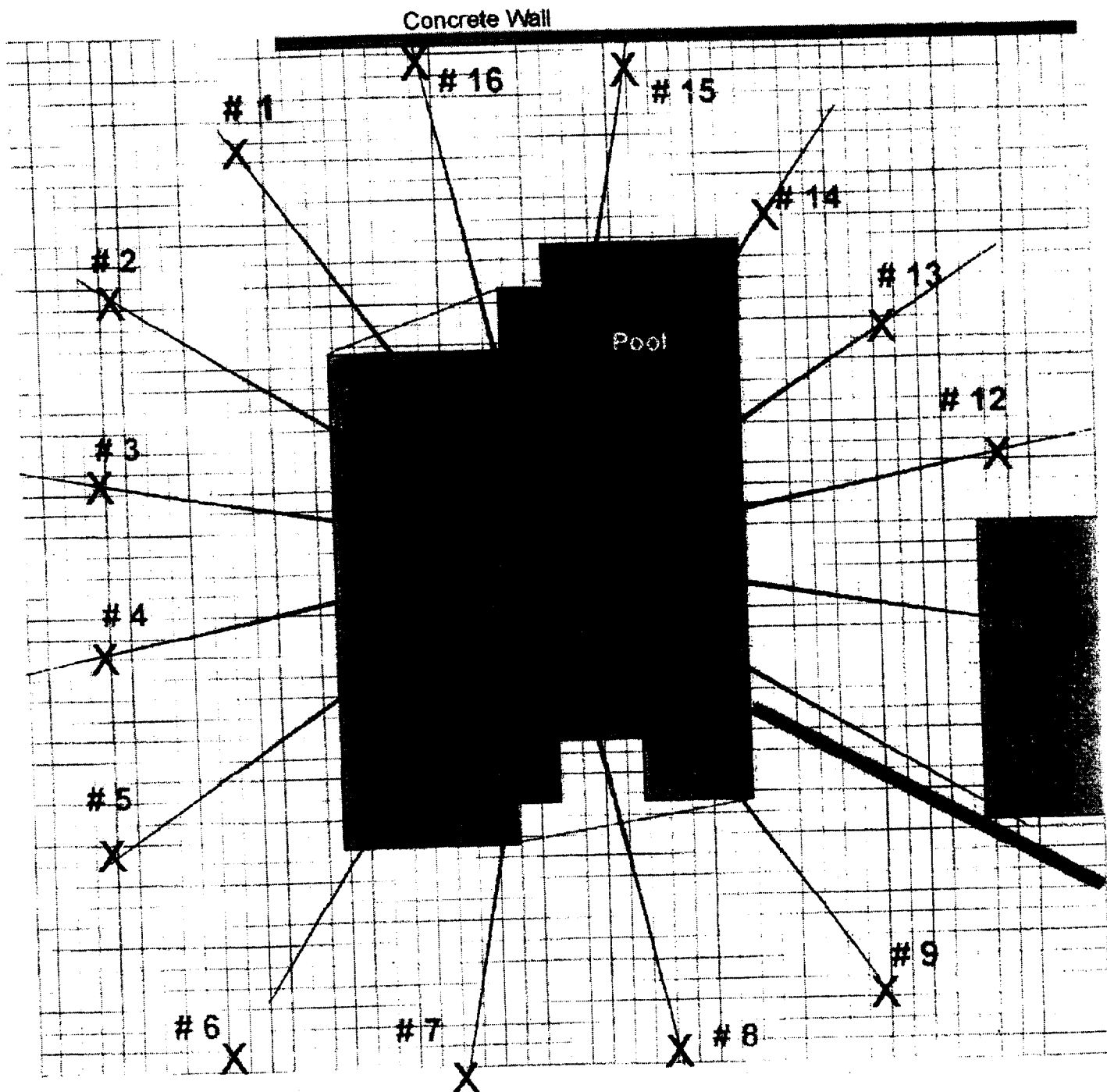
At



House # 1

1811 Tanagerlane Place

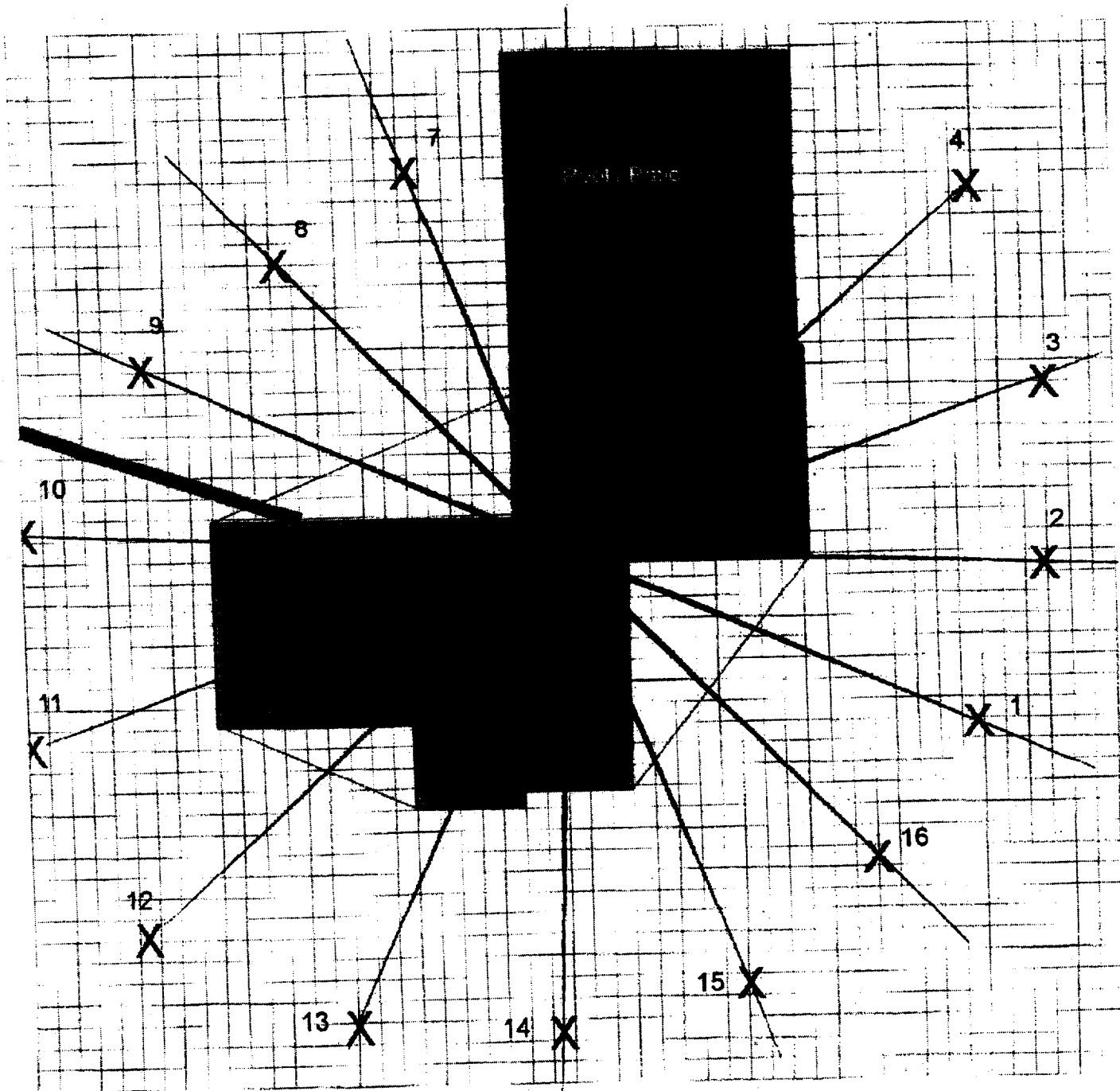
# House # 1 - 1811 Tamerlane Place



House # 2 - 33136 Chancey Rd.

A14

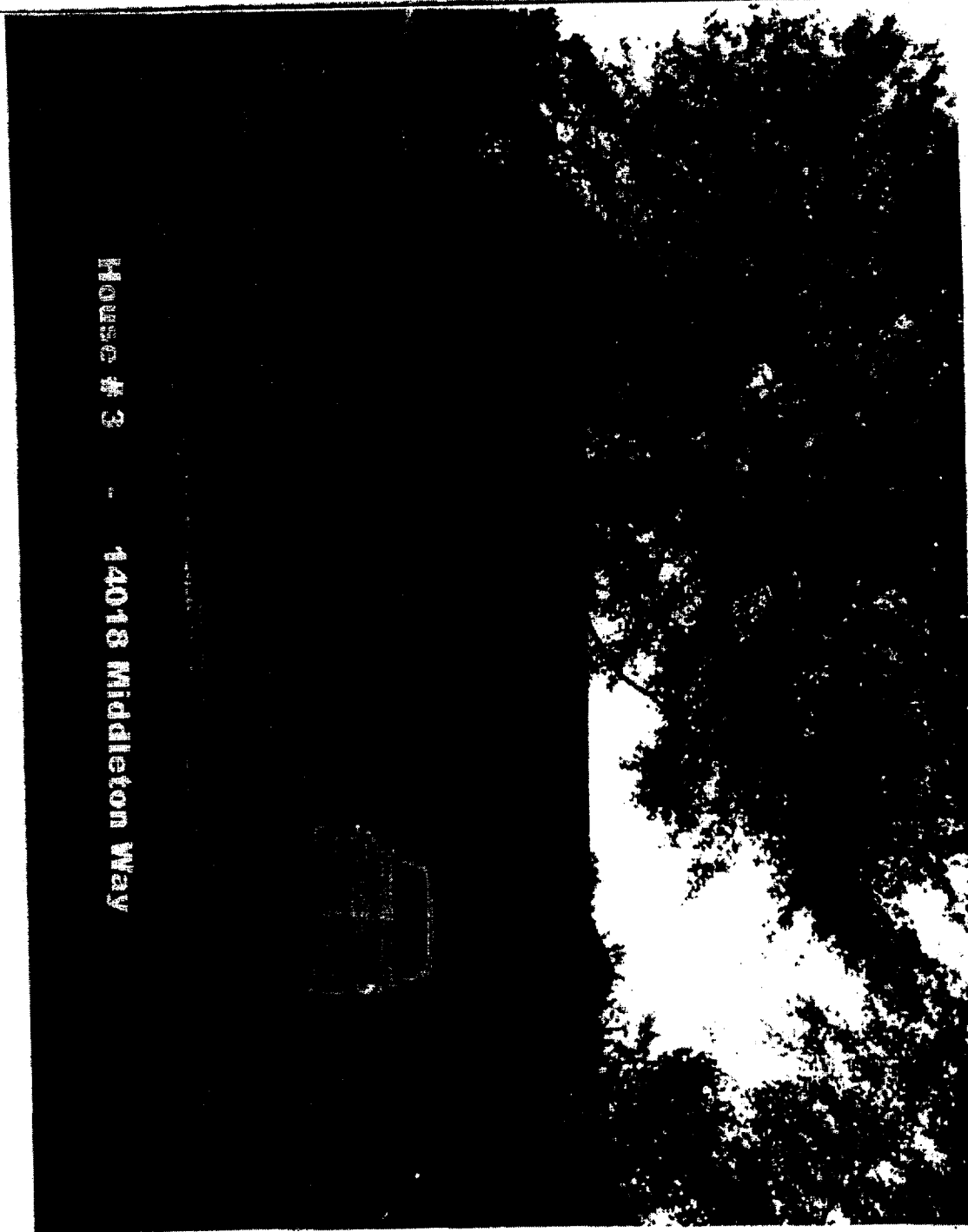
# House # 2 - 33136 Chancey Rd



Aerial  
Electrical Service

Scale - approx. 3' per square

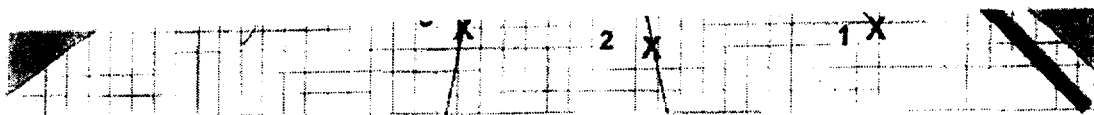
A15



House # 3

14018 Middleton Way

414

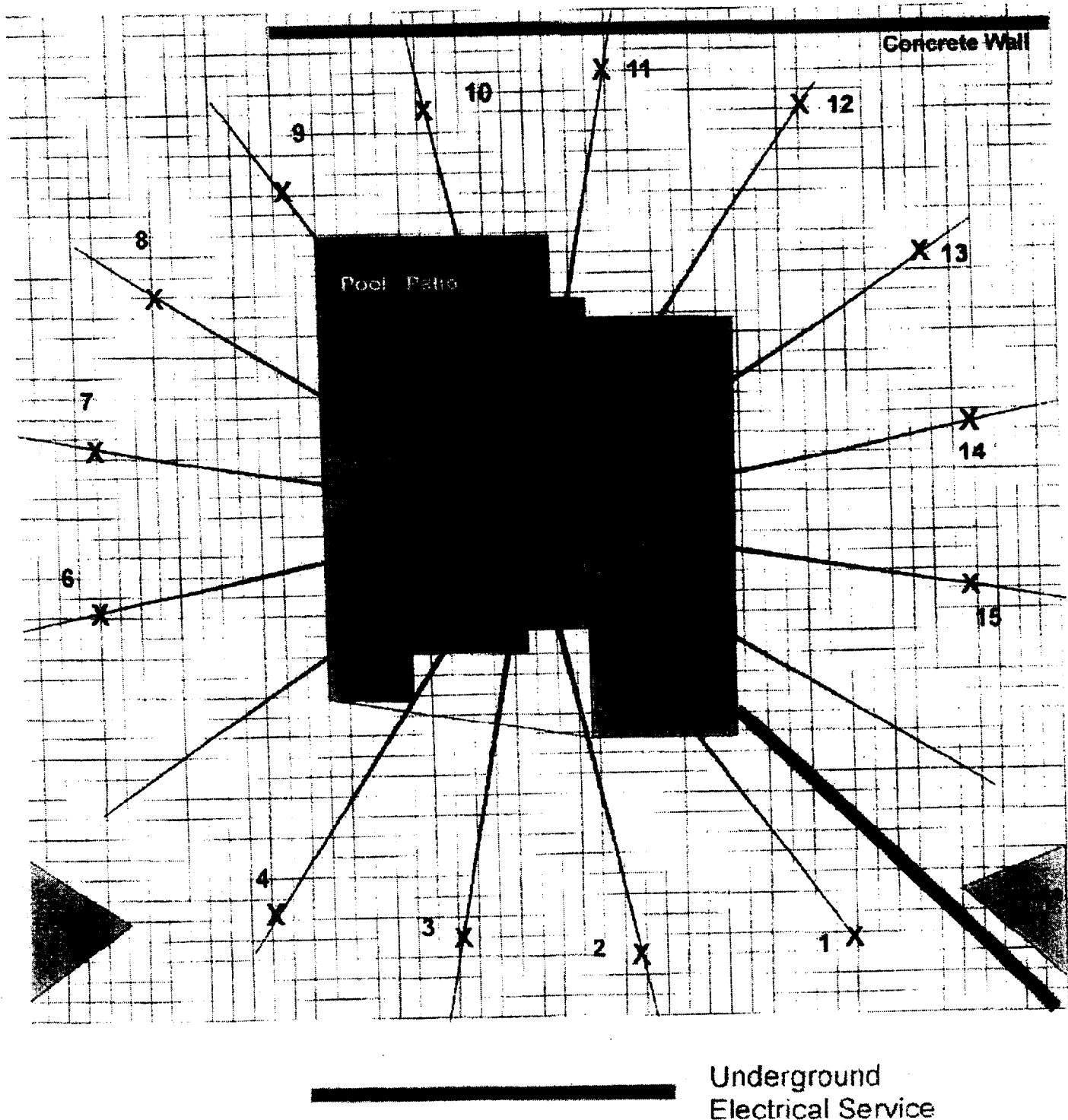


Underground  
Electrical Service

Scale - approx. 3' per square

419

# House # 3 - 14018 Middleton Way



Scale - approx. 3' per square



# **APPENDIX**

## **B**

### **System Under Test Description**

## SYSTEM COMPONENTS

\*\*\*\*\*

DEVICE TYPE: EUT, Main.Net PLC Inc. Model# NT Plus 3.0

\*\*\*\*\*

DEVICE TYPE: Essenta Laptop Computer

\*\*\*\*\*

DEVICE TYPE: Delta Power supply for Essenta Laptop Computer

\*\*\*\*\*

DEVICE TYPE: E-machines Computer used as Auxillary equipment

\*\*\*\*\*

## INTERFACE CABLES

\*\*\*\*\*

DEVICE TYPE: EUT Transmitter  
SHIELD: No  
LENGTH: 1 Meter Bundled  
CONNECTOR TYPE: RJ-45 TO RJ-45  
PORT: Ethernet to Laptop

\*\*\*\*\*

DEVICE TYPE: EUT Receiver  
SHIELD: No  
LENGTH: 1 Meter Bundled  
CONNECTOR TYPE: RJ-45 TO RJ-45  
PORT: Ethernet to desktop E-Machine computer

\*\*\*\*\*

## AC LINE CORDS

\*\*\*\*\*

DEVICE TYPE: Delta Power Supply

SHIELD: No

LENGTH: 1 METER

CONNECTOR TYPE: IEC TO DEDICATED

\*\*\*\*\*

DEVICE TYPE: EUT

SHIELD: No

LENGTH: 1 METER

CONNECTOR TYPE: 2 CONDUCTOR AC Cord (No Earth)

\*\*\*\*\*

**BOOTH, FRERET, IMLAY & TEPPER, P.C.**

ATTORNEYS AT LAW

**COPY**

ROBERT M. BOOTH, JR. (1911-1981)  
JULIAN P. FRERET (1918-1999)  
CHRISTOPHER D. IMLAY  
CARY S. TEPPER  
\_\_\_\_\_  
NIELS S. QUIST  
\*ADMITTED IN NEW YORK

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BETHESDA, MD 20814-3628  
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TELEPHONE: (202) 686-9600  
FACSIMILE: (202) 686-7797  
BFITPC@AOL.COM

SILVER SPRING OFFICE:  
14356 CAPE MAY ROAD  
SILVER SPRING, MD 20904-6011  
\_\_\_\_\_  
TELEPHONE: (301) 384-5525  
FACSIMILE: (301) 384-6384

September 8, 2004

Via Courier and Email  
David Solomon@fcc.gov  
Bruce.Franca@fcc.gov

David Solomon, Chief  
Enforcement Bureau  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

Bruce Franca, Deputy Chief  
Office of Engineering and Technology  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D.C. 20554

**RE: Experimental Station WC2XXK (File No. 0093-  
EX-PL-2002; Ameren Energy Communications  
Broadband Over Power Line System at Cape  
Girardeau, Missouri; Request for Immediate Cessation  
of Operation and Revocation of Experimental License**

Gentlemen:

This office represents ARRL, the National Association for Amateur Radio, also known as the American Radio Relay League, Incorporated (ARRL). The purpose of this correspondence and the attached exhibit is to establish that on August 8<sup>th</sup>, 2004, measurements were taken at a BPL trial system located in Cape Girardeau, Missouri, more specifically on Belleridge Pike at its intersection with Melrose Avenue (the Cape Girardeau, Missouri BPL Trial system). The result of tests conducted by Metavox, an independent engineering firm in Dulles, Virginia retained by ARRL, were such that this site has unusually high levels of radiated emissions and is not compliant with FCC part 15 limits. Therefore, the Cape Girardeau, Missouri BPL system is in violation of the specific conditions of the granted experimental license. ARRL therefore requests that

1

this experimental license be immediately revoked; that the Cape Girardeau BPL system be instructed to shut down immediately; and that it not resume operation unless the facility is shown to be in compliance with Commission rules regarding radiated emissions. As support for these requests, ARRL states as follows:

---

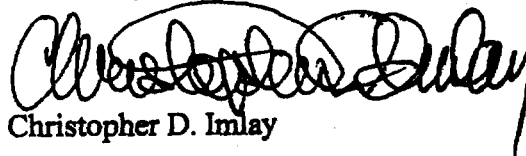
The experimental license, which expired June 1, 2004, is in the name of Ameren Energy Communications and specifies operation between 1.71 and 30 MHz. ARRL has conducted its own independent tests of the Cape Girardeau BPL system using tried and true scientific methods. Attached to this letter as Exhibit A is a report of field strength measurements taken by Metavox President Frank Gentges on August 8, 2004 on Belleridge Pike at its intersection with Melrose Avenue in Cape Girardeau. Mr. Gentges found strong BPL interference at this site, which was impulsive and was distinctive and clearly distinguishable from other users or 60 Hz power line noise. The measurement antenna was placed at a horizontal range of 30 meters horizontal distance from the medium voltage power conductors.

According to the study, the site had unusually high levels of radiated RF and is not compliant with FCC Part 15 limits. The signal structure is consistent with signals observed at other BPL locations. The measured interference levels exceeded the FCC Part 15 limits by as much as 16.6 dB at the FCC specified 30-meter distance. From these measurements taken by Metavox, it is apparent that the radiated emissions from the BPL modems at the test sites are well in excess of what the Commission's regulations permit.

ARRL notes that the standard for exceeding power limits is \$4,000. The terms of the experimental license has been violated in any case, and it must be revoked immediately and the test site shut down. ARRL requests that this test station be shut down immediately and that the appropriate monetary forfeitures be imposed against Ameren Energy Communications.

Kindly address all communications on this subject to the undersigned counsel.

Yours very truly,

  
Christopher D. Imlay

cc: James A. Strenger, Troutman Sanders LLP  
Dan Cole, President, Ameren Energy Communication  
(via U.S. Mail)



45915 Maries Road  
Suite 140  
Dulles, VA 20168-9280  
(703) 444-0511

**Cape Girardeau, MO BPL Trial System Electromagnetic Emission Tests**  
**Metavox, Inc.**  
**August 8, 2004**

## **INTRODUCTION**

Metavox, Inc conducted electromagnetic emission testing of the Cape Girardeau, MO BPL trial system. This effort was an independent measurements of the radiated emissions from overhead power line systems distributing Broadband over Power Line (BPL) service to residential subscribers.

BPL systems use digital signal communications of wide bandwidth. The systems are known to occupy spectrum in the frequency region from 1.7 MHz to 30 MHz, with harmonic content into the VHF spectrum. Some of these trial systems operate under Part 5 experimental licenses to conduct testing over a range of 1.7 MHz to 80 MHz.

The purpose of the test conducted here is to measure the field strength of radiated emissions from the BPL system in order to provide a quantitative basis for assessing the potential for interference to licensed radio systems operating in the same frequency range. Most BPL systems seek to operate under limits established by the FCC for Part 15 devices as unlicensed, unintentional emitters. The testing conducted here will assist in efforts to compare the observed BPL emissions to the emission limits established by FCC pertaining to unlicensed devices. Specifically, FCC in Part 15 currently "requires that unlicensed devices operating below 30 MHz comply with a quasi-peak radiated emission limit of 30  $\mu$ V/m at a distance of 30 meters at all frequencies over the range from 1.705 to 30 MHz." This corresponds to 29.54 dB above one microvolt per meter which is the unit of field strength reported here.

On August 8th, 2004, measurements were taken at a BPL trial system located on Belleridge Pike at its intersection with Melrose Avenue. The results of the Metavox tests are tabulated in Appendix 2: Test Data, a description of the testing and test sites is described in the following sections.

## **APPROACH**

Metavox outfitted a mobile van with calibrated emission-measuring equipment (see Appendix 3: Equipment). The mobility is used in the area of a BPL system to first locate specific positions where the BPL radiated emission is clearly detectable. A picture at the Cape Girardeau test site is shown in Figure 1. Figure 2 shows the electronics bench in the van interior with (from left to right on the bottom row of equipment) an HP 141T/8553L/8552A spectrum analyzer, a Tektronix 485 oscilloscope, and the Rohde & Schwarz ESH 2 test receiver. Above them is a Boonton 92A-S2 RF millivoltmeter and a Teac RD-111T PCM instrumentation recorder.

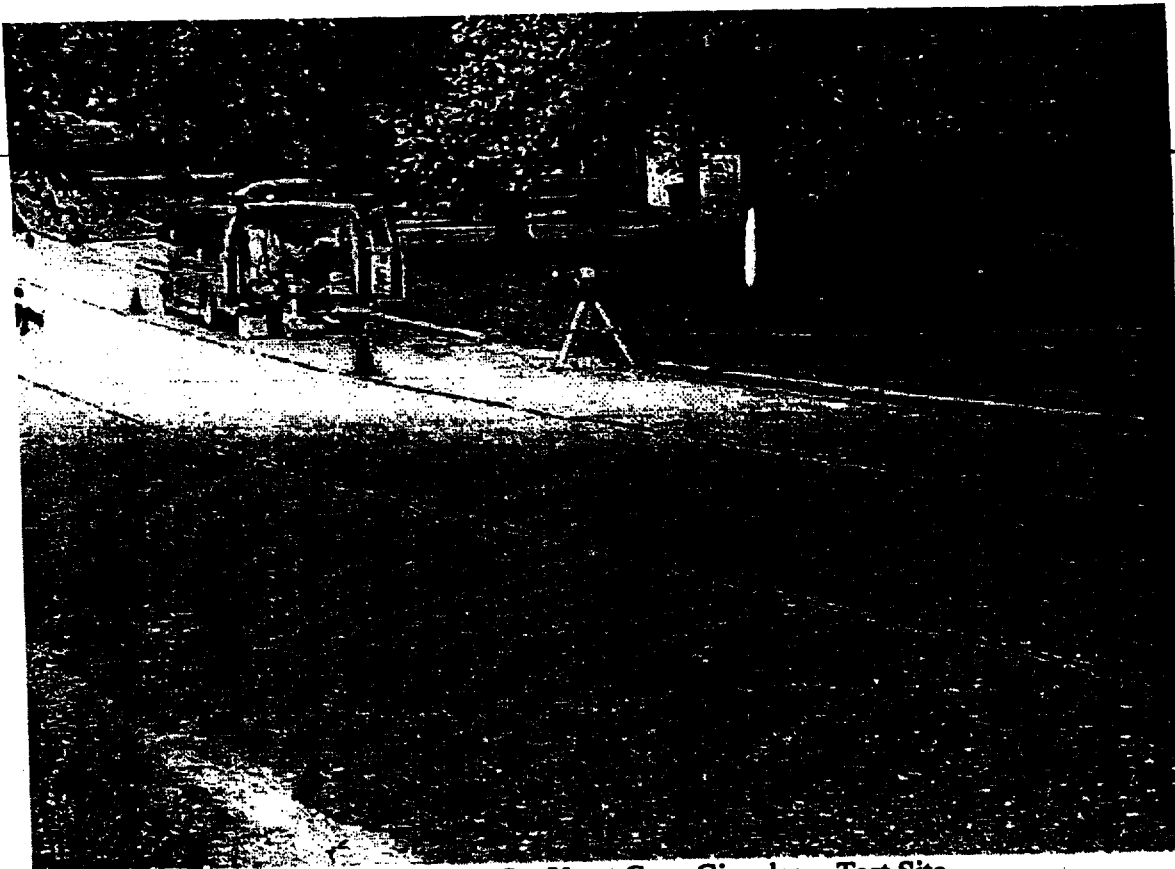
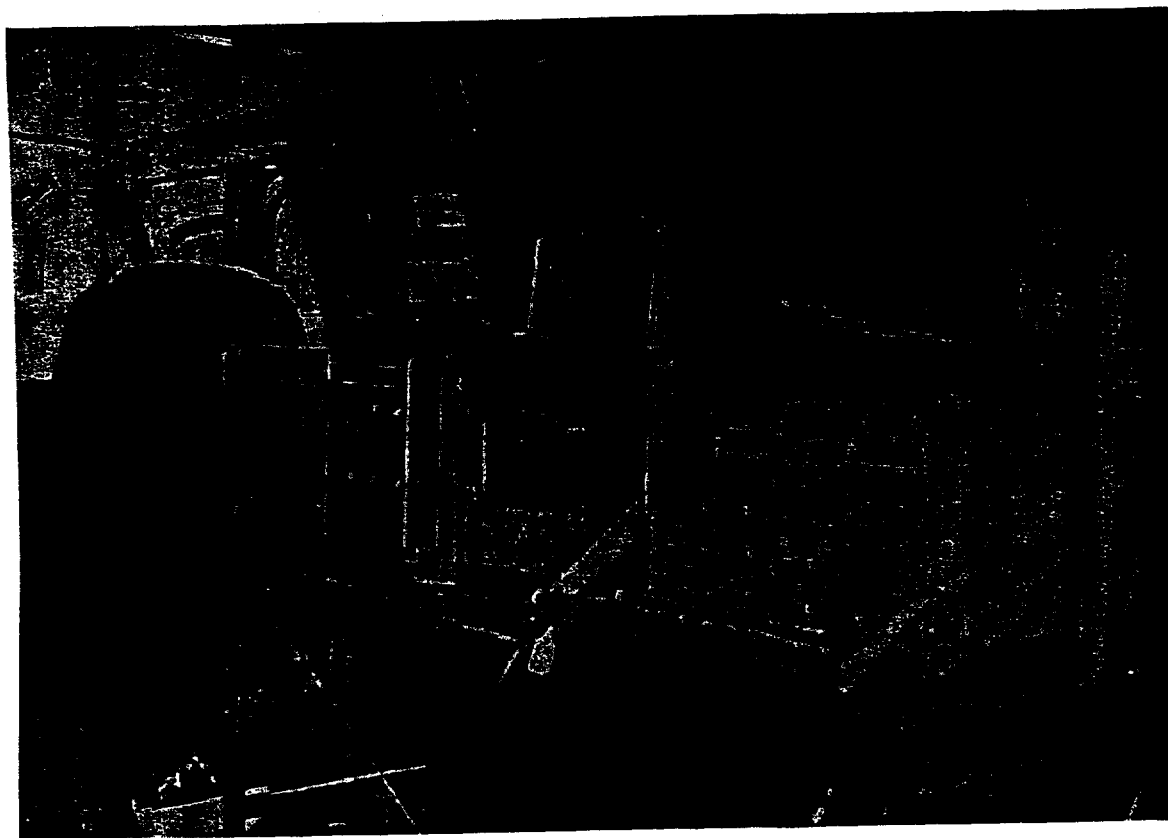


Figure 1 Test Van Set Up at Cape Girardeau Test Site





For signal level measurements, the ARA BBH-500/B active loop antenna is set out at about 5 to 10 meters from the vehicle as shown in Figure 1. The tripod positions the center of the loop at 1 meter above the ground. The full array of equipment is used in site selection to determine that the BPL signal is distinguishable and that the signal strength is adequately handled within the dynamic range of the instruments. However, in the test measurement process, only the active loop antenna, ARA model Model BBH-500/B and ESH 2 receiver are used for taking data. These instruments are calibrated to standards traceable to National Institute for Standards and Technology (NIST). Each field strength measurement is accurate within  $\pm 1.5$  dB since measurement accuracy is the combination of (uncorrelated) factors for the antenna (ARA model Model BBH-500/B) and the test receiver (Rohde & Schwarz ESH2) as given in the Appendix 2: Equipment.

Antenna placement and orientation was made considering all of the conductors of the surrounding power distribution system including the medium voltage power conductors, the secondary cable between transformers and the secondary cables to houses. A measurement of the output of the active loop is first made using a 300 MHz bandwidth Tektronix 485 oscilloscope to insure the active circuits are not overloaded by a strong signal. Measurements were then taken at three orthogonal orientations of the antenna for each frequency. Measurements were made using the receiver's CISPR mode. The CISPR measurement mode provides an objective measure of the effect of an interference on the reception of radio telephony.

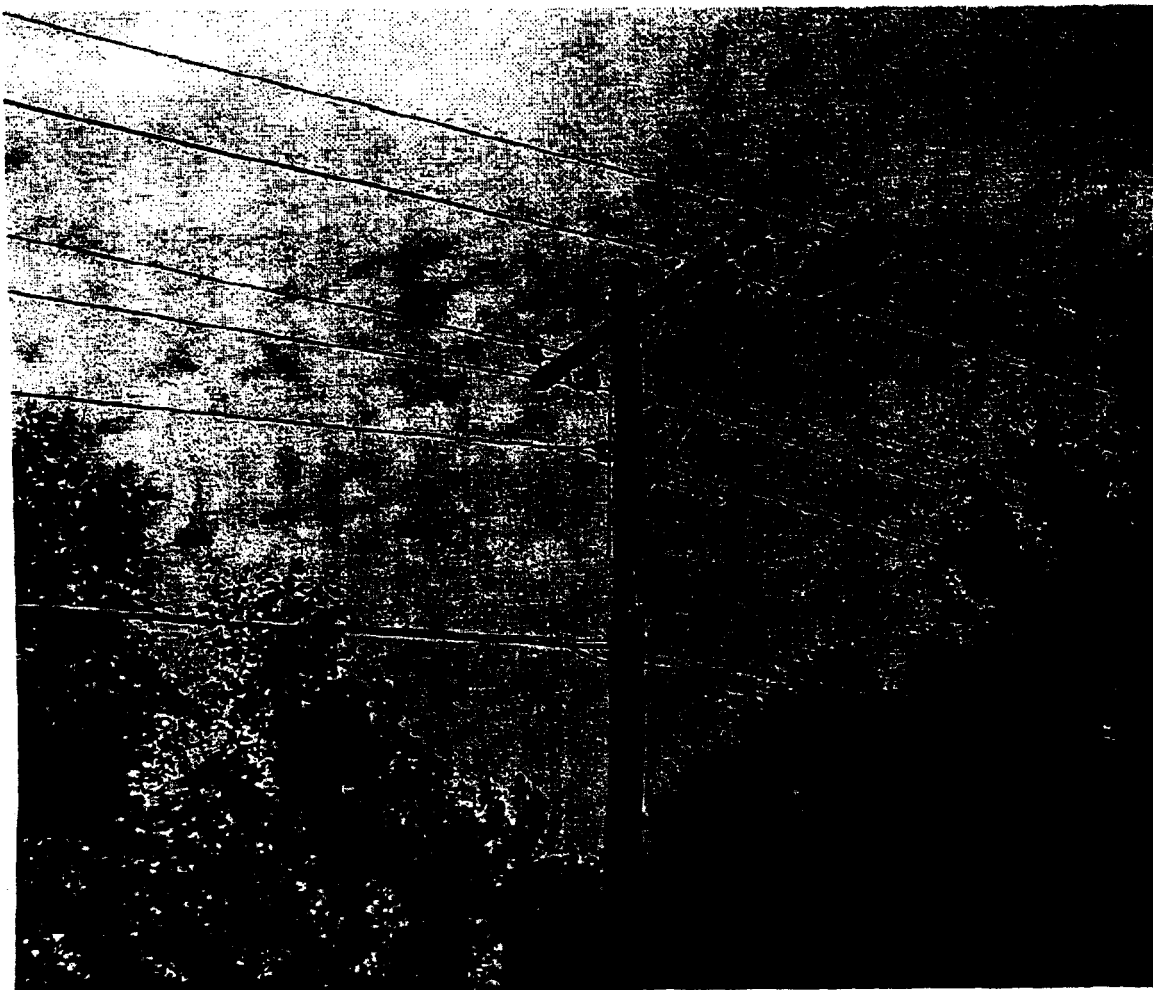


Figure 3 Cape Girardeau Test Site Power Pole and Lines Including BPL Installation

## TEST DESCRIPTION

### Cape Girardeau-1

Testing was performed on a trial BPL system operating at Cape Girardeau, MO.. (see Appendix 1: Sites, Cape Girardeau-1) on August 8th, 2004. The detailed results are presented in Appendix 2: Test Data, Cape Girardeau-1 for a 30 meter horizontal distance from the power line.. The far right hand column is the RMS of the 3 field strength. This value bounds the worst possible level of interference by orientations. It may not determine non-compliance with FCC Part 15. The single axis measurements shown in bold type indicate non-compliance.

Figure 3 shows the overhead line on a pole along Melrose Avenue at the intersection with Belleridge Pike. This figure shows three-phase medium voltage lines running along Melrose Avenue. Telephone and fiber optic cables are below the medium voltage lines. The BPL interference at this site was impulsive and was distinctive and clearly distinguishable from other users or 60 Hz power line noise. The measurement antenna was placed at a horizontal range of 30 meters horizontal distance from the medium voltage power conductors.

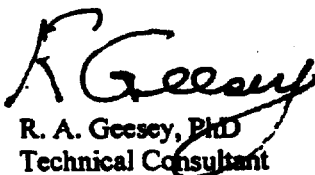
## CONCLUSIONS

This site had unusually high levels of interference and is not compliant with FCC Part 15 limits. The signal structure radiated is consistent with signals observed at other Main.Net sites.

The measured interference levels exceeded the FCC Part 15 limits by as much as 16.6 dB at the FCC specified 30 meter distance. It is possible that these levels could be reduced with system level adjustments and other system grooming to bring the system into conformance with the FCC limits.



Frank H. Gentges  
President Metavox Inc.



R. A. Geesey, PhD  
Technical Consultant



André V. Kesteloot  
Life Senior Member, IEEE  
Technical Consultant



B. E. Keiser, DScEE, PE  
Project Consultant

## Appendix 1: Sites

### Cape Girardeau-1

The Cape Girardeau test site is along Melrose Avenue at the intersection with Belleridge Pike. A three-phase overhead medium voltage line runs along Melrose Avenue. This power line is where the BPL test system is installed. The neighborhood surrounding the test site is a fully developed community of single family homes and probably is at least 30 or more years old.

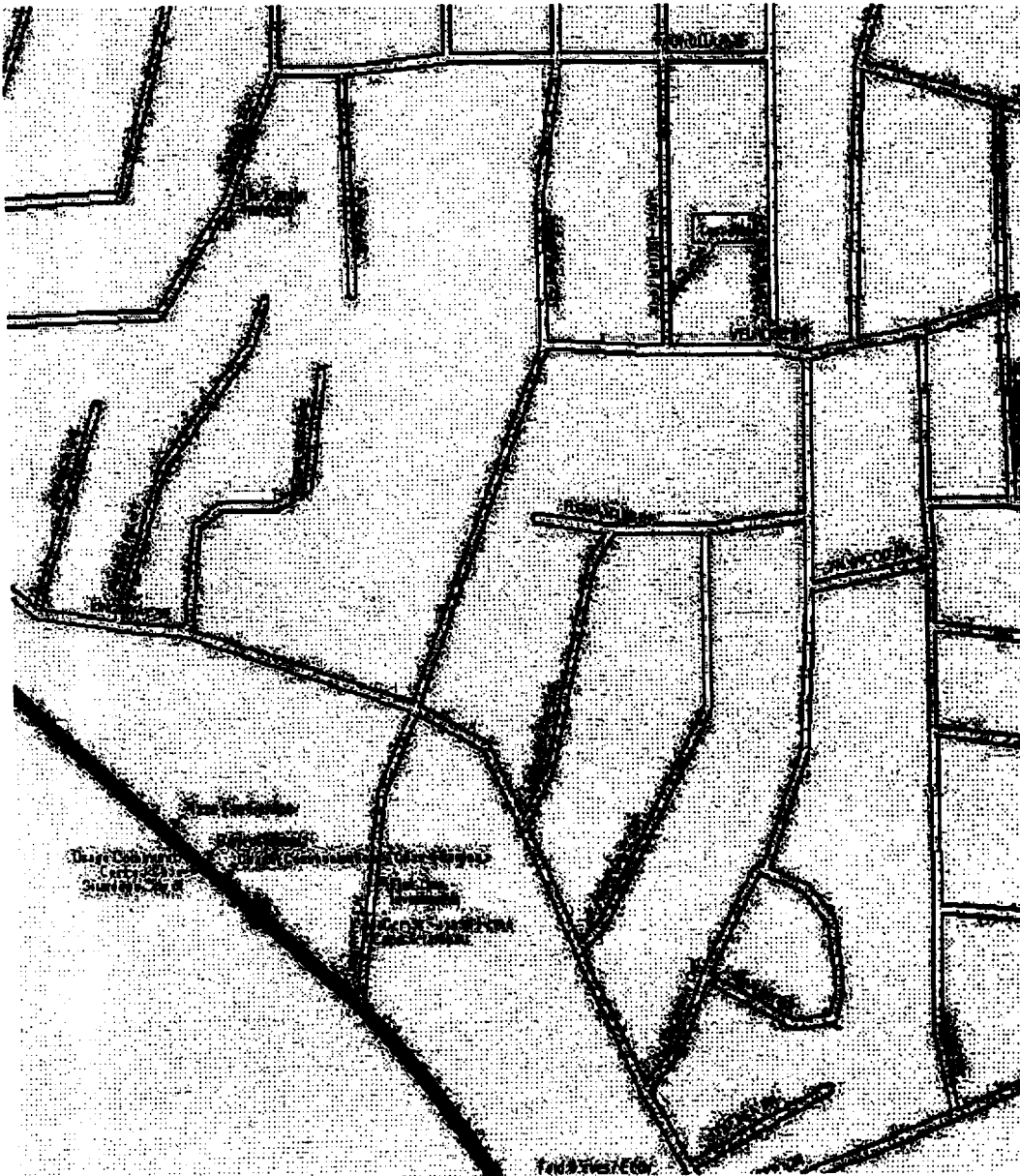


Figure 4 Cape Girardeau Test Site

## Appendix 2: Test Data

Site: Cape Girardeau-1

August 8, 2004

Melrose Ave & Belleridge Pike

Cape Girardeau, MO

H-Probe Antenna: ARA Model BBH-500/B 1 meter high

| Freq<br>MHz | Receiver Indicated Strength |           |  |                         |                         |            | Field Strength |          |      | RMS<br>(3-axis)<br>dBµV/m |
|-------------|-----------------------------|-----------|--|-------------------------|-------------------------|------------|----------------|----------|------|---------------------------|
|             | Cable                       |           | Antenna Factor (equiv. electrical, interpolated) |                         |                         |            |                |          |      |                           |
|             | #1                          | #2        | // to Line                                       | to Line                 | Vertical                | // to Line | to Line        | Vertical |      |                           |
|             | dB loss                     | dB1/meter | Gain dBµV<br>base+meter                          | Gain dBµV<br>base+meter | Gain dBµV<br>base+meter | dBµV/m     | dBµV/m         | dBµV/m   |      |                           |
| 3.50        | 1.2                         | -6.00     | 20 13.0  | 20 16.0                 | '                       | 28.2 i     | 31.2 i         |          |      |                           |
| 3.60        | 1.2                         | -6.00     | 20 11.0  | 20 15.0                 | '                       | 28.2 i     | 30.2 i         |          |      |                           |
| 3.70        | 1.2                         | -6.10     | 20 14.0  | 30 12.0                 | '                       | 26.1 i     | 37.1 i         |          |      |                           |
| 3.80        | 1.2                         | -6.10     | 20 12.0  | 30 9.0                  | '                       | 29.1 i     | 34.1 i         |          |      |                           |
| 4.00        | 1.2                         | -6.10     | 20 16.0  | 30 14.0                 | '                       | 31.1 i     | 39.1 i         |          |      |                           |
| 4.50        | 1.2                         | -6.50     | 30 14.0  | 30 12.0                 | '                       | 38.7 i     | 36.7 i         |          |      |                           |
| 4.99        | 1.2                         | -6.80     | 30 10.0  | 20 13.0                 | '                       | 34.4 i     | 27.4 i         |          |      |                           |
| 5.50        | 1.2                         | -6.87     | 30 10.0  | 20 13.0                 | '                       | 34.3 i     | 27.3 i         |          |      |                           |
| 6.00        | 1.2                         | -6.87     | 30 12.0  | 20 12.0                 | 10 9.0                  | 36.3 i     | 26.3 i         | 13.3 i   | 36.8 |                           |
| 6.50        | 1.4                         | -6.87     | 30 11.0  | 20 15.0                 | 10 12.0                 | 35.6 i     | 29.6 i         | 16.6 i   | 36.6 |                           |
| 7.00        | 1.5                         | -6.87     | 30 14.0  | 20 13.0                 | '                       | 38.6 i     | 27.6 i         | -5.4 i   | 39.8 |                           |
| 7.10        | 1.5                         | -6.87     | 30 9.0   | 20 8.0                  | '                       | 33.6 i     | 22.6 i         | -5.4 i   | 34.0 |                           |
| 7.20        | 1.5                         | -6.87     | 30 10.0  | 20 10.0                 | '                       | 34.6 i     | 24.6 i         | -5.4 i   | 35.0 |                           |
| 7.30        | 1.5                         | -6.87     | 30 9.0   | 20 7.0                  | '                       | 33.6 i     | 21.6 i         | -5.4 i   | 33.9 |                           |
| 8.01        | 1.8                         | -6.87     | 40 10.0  | 20 12.0                 | 20 9.0                  | 44.9 i     | 26.9 i         | 23.9 i   | 45.0 |                           |
| 9.14        | 1.6                         | -6.87     | 30 16.0  | 20 16.0                 | 20 9.0                  | 40.7 i     | 30.7 i         | 23.7 i   | 41.2 |                           |
| 9.69        | 1.5                         | -6.87     | 30 13.0  | 20 16.0                 | 20 8.0                  | 37.6 i     | 30.6 i         | 22.6 i   | 38.5 |                           |
| 10.15       | 1.4                         | -6.87     | 30 16.0  | 30 9.0                  | 20 8.0                  | 40.5 i     | 33.5 i         | 22.5 i   | 41.4 |                           |
| 10.20       | 1.4                         | -6.87     | 30 15.0  | 30 8.0                  | 20 9.0                  | 39.5 i     | 32.5 i         | 23.5 i   | 40.4 |                           |
| 10.89       | 1.6                         | -6.60     | 30 17.0  | 30 14.0                 | 20 10.0                 | 42.0 i     | 39.0 i         | 25.0 i   | 43.8 |                           |
| 11.61       | 1.7                         | -6.20     | 30 16.0  | 30 14.0                 | 20 5.0                  | 41.5 i     | 39.5 i         | 20.5 i   | 43.6 |                           |
| 12.25       | 1.8                         | -6.10     | 40 11.0  | 40 8.0                  | 20 7.0                  | 46.7 i     | 43.7 i         | 22.7 i   | 48.5 |                           |
| 14.00       | 2.0                         | -5.57     | 30 12.0  | 30 12.0                 | 20 7.0                  | 38.4 i     | 38.4 i         | 23.4 i   | 41.5 |                           |
| 14.10       | 2.0                         | -5.50     | 30 10.0  | 30 8.0                  | 20 9.0                  | 36.5 i     | 34.5 i         | 25.5 i   | 38.8 |                           |
| 14.20       | 2.0                         | -5.50     | 30 11.0  | 30 11.0                 | 20 7.0                  | 37.5 i     | 37.5 i         | 23.5 i   | 40.6 |                           |
| 14.35       | 2.0                         | -5.46     | 30 10.0  | 30 10.0                 | 20 4.0                  | 36.5 i     | 36.5 i         | 20.5 i   | 39.6 |                           |
| 15.75       | 2.1                         | -5.01     | 30 15.0  | 20 14.0                 | 10 12.0                 | 42.1 i     | 31.1 i         | 19.1 i   | 42.4 |                           |
| 18.10       | 2.2                         | -4.10     | 30 14.0  | 30 12.0                 | 10 16.0                 | 42.1 i     | 40.1 i         | 24.1 i   | 44.3 |                           |
| 18.20       | 2.2                         | -4.10     | 30 14.0  | 30 15.0                 | 20 8.0                  | 42.1 i     | 43.1 i         | 26.1 i   | 45.7 |                           |
| 18.30       | 2.2                         | -4.10     | 30 18.0  | 30 16.0                 | 20 10.0                 | 46.1 i     | 44.1 i         | 28.1 i   | 48.3 |                           |
| 18.40       | 2.2                         | -4.00     | 30 17.0  | 30 14.0                 | 20 11.0                 | 45.2 i     | 42.2 i         | 29.2 i   | 47.8 |                           |
| 21.00       | 2.2                         | -3.10     | 30 13.0  | 30 10.0                 | 20 14.0                 | 42.1 i     | 39.1 i         | 33.1 i   | 44.2 |                           |
| 21.10       | 2.2                         | -3.10     | 30 13.0  | 30 11.0                 | 20 10.0                 | 42.1 i     | 40.1 i         | 29.1 i   | 44.4 |                           |
| 21.20       | 2.2                         | -3.10     | 30 12.0  | 30 10.0                 | 20 11.0                 | 41.1 i     | 39.1 i         | 30.1 i   | 43.4 |                           |
| 21.30       | 2.2                         | -3.00     | 30 10.0  | 30 5.0                  | 20 9.0                  | 39.2 i     | 34.2 i         | 28.2 i   | 40.6 |                           |
| 21.40       | 2.2                         | -3.00     | 30 11.0  | 30 5.0                  | 20 10.0                 | 40.2 i     | 34.2 i         | 29.2 i   | 41.4 |                           |

Site Monitor:

antenna output  
scope (peak-peak)  
200mv

Notes:

i:BPL Impulses

Bold indicates BPL signal field strengths exceed FCC limits

### Appendix 3: Equipment

Metavox tests used equipment calibrated to standards traceable to National Institute for Standards and Technology (NIST):

- Amplified magnetic-field antenna
- Receiver capable of tuning the HF band, with quasi-peak detection matching CISPR specifications.

Amplified H-Field Antenna: ARA Technologies, Inc., Model BBH-500/B, Serial Number 311

Reference: "Data Book, Magnetic Field Antennas, BBH-500/B", page 42; Antenna Research Associates, Inc, Beltsville, Maryland, 20705

*The BBH series of broadband magnetic field (H field) receiving antennas are designed to provide maximum sensitivity for receiving magnetic field signals in the VLF, 100 Hz, through VHF, 100MHz, spectrum. These antennas are responsive primarily to the magnetic component of an electromagnetic field with practically no sensitivity to the electric component. The electrical balance with respect to ground and cable renders them almost immune to common mode interference. They exhibit remarkably clean reception in environments of locally generated man-made noise.*

*The far-field receiving pattern is that of an elementary dipole with nulls of approximately -20 dB occurring off the ends of the rod. Integral active networks ensure the highest possible sensitivity. The BBH antennas yield much greater accuracy in measuring the tangential field of a source at close range than is possible with typical air core loops.*

*An internal power supply and rechargeable batteries in these antennas minimize disturbances and permit operation under practically any condition.*

Magnetic field strength indication from the H-field antenna device is converted to electric field strength by the free space impedance with the common value of  $377\Omega$ :

$$af^{electric}_{(dB/m)} = af^{magnetic}_{(dB/m)} + 51.35_{dB\Omega}$$

The noise floor of the H-field antenna using the manufacturer's specifications, and scaled to the CISPR bandwidth of 9kHz, (i.e. 9.54 dB relative to 1kHz) is:

| Frequency, MHz:                           | 1    | 3   | 10  | 30   |
|---|------|-----|-----|------|
| Noise Floor Field Strength, dB $\mu$ V/m: | 34.9 | 5.9 | 2.9 | 10.9 |

Calibration: The Antenna Research Associates Model BBH-500/B, Serial Number 311, was calibrated by Liberty Laboratories Inc., 1346 Yellowwood Road, Kimberton, IA 51543, on Thursday, February 19, 2004, with Certification number: 2004021814 issued to Metavox, Inc.

Traceability: Certificates of Liberty Laboratories state that:

*All measurement instrumentation is traceable to the National Institute of Standards and Technology (NIST). Supporting documentation relative to traceability is on file and is available for examination upon request. Measurement procedures per Military Handbook 52A as guidance for Military Standard (MIL-STD) 45662A, ANSI/NCSS Z540-1-1994, ISO/IEC 17025 and Liberty Labs, Inc. procedure OP-2.*

**Accuracy:** The electrical equivalent antenna factor  $a_{\text{electric}}^{\text{BSH}} \text{ (dB/m)}$  is accurate within 0.9 dB for the frequency range from 1 to 30 MHz and certified by the calibration.

**Receiver:** Rohde and Schwarz Model ESH2, Serial Number 831436/006

**Reference:** "Data Sheet, Test Receiver ESH 2", Rohde & Schwarz, Republic of Germany.

*The Test Receiver ESH 2 is a manually operated, highly sensitive and overload-protected test receiver offering a very wide dynamic range. Compact design, the wide range of power supplies that can be used, and low power consumption make the receiver suitable for use in fixed stations as well as for mobile and portable applications, such as field-strength measurements.*

*The ESH 2 can tune from 9kHz to 30MHz and operates as a selective voltmeter in a level range from -30 to +137 dB<sub>μV</sub> in 50 Ω systems. Overload of the input or of other important circuits is detected and signaled by the test receiver.*

*Selection of "CISPR quasi-peak weighted" detection provides an IF bandwidth (-6 dB) for measurements according to CISPR Publications 1 and 3 with 9kHz bandwidth for the HF frequency range.*

**Calibration:** The Rohde & Schwarz Model ESH2, Serial Number 831436/006, was calibrated by Industrial Process Measurement, Inc, Edison, NJ, 08820, on February, 5, 2004, with Certificate number 23725-01.

**Accuracy:** The frequency accuracy in the range of 1-30 MHz is +/- 0.00050 MHz.

The frequency response over the 0.01-30 MHz range, at a signal level of 80.0 dB<sub>μV</sub>, is accurate to +/- 1 dB<sub>μV</sub> and certified by the calibration.

REC'D & INSPECTED

MAR 24 2004

FCC-OC MAIL ROOM

Report of Harmful Interference From a Broadband Over Power Line Trial  
or Deployment

Name of complainant: Donald W. BLASDELL  
 Call sign (if applicable): W4HJL  
 Station location: 9727 LEWISDALE AVE., MANASSAS, VA 20109  
 Mailing address (if different): \_\_\_\_\_  
 City, State, Zip: \_\_\_\_\_  
 Telephone: 703-369-2877 Email: W4HJL@AOL.COM  
 Description of Interference: \_\_\_\_\_  
Noise on Mobile @ 50 - ECARS -  
(Recorded)

Description of station: Mobile Station - Signal Hill Road  
+ N. Tany Drive - Manassas, VA  
 Receiver(s) affected: ICOM 706 MARK II G  
 Antenna type: Mobile "BANDHOPPER" Antenna (Scissor driver)  
 Antenna location: on Mobile "Tundra"  
 Distance of antenna from own house (feet): n/a  
 Distance of antenna from neighboring houses (feet): n/a  
 Distance of antenna from power distribution line or equipment (feet): 2 blocks (200 ft.)

Log of interference:

| Date    | Time     | Frequency | Receive Mode | Interfering signal strength | Description           |
|---------|----------|-----------|--------------|-----------------------------|-----------------------|
| 3/17/03 | 12:56 pm | 725.5     | SSB          | +20-40 dB over 59           | Sounded like "pulses" |



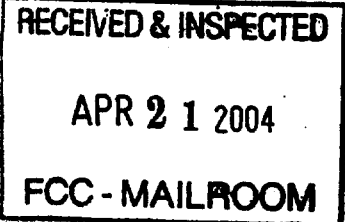




Allen P. Todd, P.E.  
Director of Utilities

**DEPARTMENT OF UTILITIES**

8500 Public Works Drive  
P.O. Box 560  
Manassas, VA 20110



Telephone: (703)257-8351  
Facsimile: (703)257-8361

April 15, 2004

James R. Burtle  
Chief, Experimental Licensing Branch  
Federal Communications Commission  
Gettysburg, PA 17325

Dear Mr. Burtle:

Thank you for forwarding to the City letters from Ms. Ruth Frock, President, Ole Virginia Hams (OVH) Amateur Radio Club Inc. and from Amateur Radio Operator, Mr. George V. Tarnovsky, who is also a member of the OVH Club. Both letters expressed their concerns regarding possible radio interference caused by Broadband over Power Line (BPL) deployment in Manassas.

Before responding to their concerns, let me first describe the deployment of BPL in the City of Manassas. In October, 2001, The City of Manassas was awarded a grant by the American Public Power Association (APPA) for initiation of a pilot project to evaluate the delivery of high speed internet service through the City's existing electric distribution system. During this project, the City utilized the existing fiber optic network and newly developed Broadband over Power Line (BPL) equipment provided by Main.net communications, to construct a communications network. The network delivered high-speed internet access to residential and commercial participants of the pilot. During the project, participants enjoyed the ease and flexibility of high-speed internet access through a modem plugged into any electric outlet in their home. Throughout the project, participants made favorable statements regarding their use of this new technology. The speed, portability, ease of installation, and reliability were welcomed features of the system to project participants.

Through the success of the pilot project, the City demonstrated the advantages and feasibility of using BPL technology for the delivery of broadband services. Likewise, Manassas citizens indicated their desire to utilize a new technology for accessing the internet. The knowledge and experience gained from the pilot, as well as the successful customer experience of the pilot participants, compelled the City to push forward with a full-scale deployment of BPL.